

To: Dan Halden[Daniel.Halden@lacity.org]
Cc: Frank Mateljan[frank.mateljan@lacity.org]
From: Bethelwel Wilson
Sent: Thur 5/14/2020 6:55:58 PM
Subject: Re: ATTORNEY CLIENT PRIVILEGE: Response to CPRA RequestCD13.2019.06.10.a #9

All CD13 staffers searched their accounts for responsive documents, the entirety of which are in your possession. I'll leave it up to you whether to unredact some of the emails he claims are public (which he is probably right). My guess is that you could leave these emails redacted and he will not sue because he even admits that his interest in the emails are stale. Moreover, it appears he already knows the content of the redacted emails.

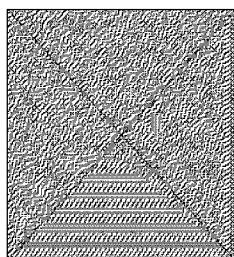
On Thu, May 14, 2020 at 11:40 AM Dan Halden <Daniel.Halden@lacity.org> wrote:


Frank and Bethelwel,

Hello again! See below for the two most recent emails in this thread. Adrian is complaining about a number of things. He said, among other things, that it's "obvious" we only checked two email accounts, which is not accurate. Multiple staff checked and responded to me with documents, and I provided those to Adrian.

Please let me know how or if I should respond to the other various inquiries. So far, the only draft response I have is to his question of who made the redactions:

Hi Adrian,
Individual staff checked and made redactions to their individual emails/documents.
Thanks,
Dan



Dan Halden
Director, *HEART of Hollywood*
(213) 254-7214 | cd13.com | heartofhollywood.la
Find the Councilmember on: 
[View](#) the concept for the Walk of Fame Master Plan
[Comment](#) on the concept for the Walk of Fame Master Plan

----- Forwarded message -----

From: <adrian@123mail.org>
Date: Sun, May 10, 2020 at 7:36 PM
Subject: Re: Response to CPRA Request CD13.2019.06.10.a #9
To: Dan Halden <Daniel.Halden@lacity.org>

Good evening, Mr. Halden.

I forgot to ask you who it was who determined which material should be redacted from this production.
Name/Title please, as required by law.

Thanks!

A.

On Sun, May 10, 2020, at 3:55 PM, adrian@123mail.org wrote:

Good afternoon, Mr. Halden.

There are a few problems with this production, although that's bound to happen when you rush through work like this. Eleven months is very little time, I admit, and of course I thank you for your diligence!

First, again, you've apparently failed to check all email accounts. Obviously only your account and Mr. Fregoso's were checked. There are, however, plenty of responsivenesses in other CD13 accounts. If I'm assuming too much, if you did check all CD13 staff accounts and MOF's, then I suppose all these missing emails are exempt?

And yet, again, the only exemption you've claimed is your constituents-won't-write-to-MOF-if-we-expose-them-to-ridicule-by-publicly-linking-their-names-with-their-opinions reading of section 6255(a). That prima facie does not apply to emails, e.g., between Ms. Miller and ePath and yet you've failed to search her account. Please clarify.

And also this exemption claim does not seem to apply to pretty many of your own redactions. For instance, consider the email (attached) from Mr. Torres to you. He sent it and yet you've redacted names, presumably on the basis of your above-named theory. It can't possibly apply, though, because these names are not CD13's correspondents. They're recipients of an email sent by someone else entirely. It's not possible that the release of such a name could have any effect on the willingness of any person to communicate with the office of CD13. Please, therefore, explain what authority you have for redacting these names.

And also consider the call-cancelling email, also attached. Here you've redacted Stephen Saengpradap's email, which is awdfs@msn.com. This is an email address that Mr. Saengpradap, who is paid with public funds by a public agency, uses to conduct his publicly-funded, publicly-directed work. Not only that but the City of Los Angeles has on a number of occasions already released Mr. Saengpradap's email address unredacted, thus waiving any possible exemption claims.

And finally it's not plausible that Mr. Saengpradap's email address is redactable on your no-constituent-chilling theory given that he lives at 849 S. Sierra Bonita, which is in CD4. He's not a constituent of Mr. O'Farrell's. The address, if you're wondering, was also released unredacted by the City of Los Angeles and thus exemption claims have been waived for it as well.

I'm sure that if I found these errors in just a few minutes of superficial skimming there are pretty likely others I didn't find yet. You can find them, though! Also, you can have the other members of your office including your boss search their email accounts for responsivenesses.

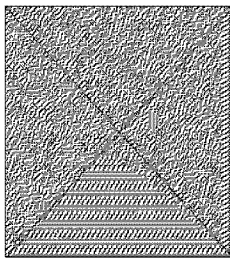
And I hope you will do it very soon. The interest in this material is already pretty stale even though you so very kindly rushed, rushed, rushed to get it done so quickly. What a tragedy it will be if we, Mr. O'Farrell's true constituents, have to wait another eleven months for you to finish production.

Thanks, Mr. Halden!

A.

On Thu, May 7, 2020, at 2:13 PM, Dan Halden wrote:


Hi Adrian - See attached. This is the last batch. Thanks for your patience.



Dan Halden

Director, *HEART of Hollywood*

(213) 254-7214 | cd13.com | heartofhollywood.la

Find the Councilmember on: 

[View](#) the concept for the Walk of Fame Master Plan

[Comment](#) on the concept for the Walk of Fame Master Plan

Attachments:

- City of Los Angeles Mail - Neighborhood Watch Committee Meeting (PATH).pdf
- City of Los Angeles Mail - Neighborhood Watch Committee_ Tomorrow.pdf
- City of Los Angeles Mail - New year, same goal_homes_.pdf
- City of Los Angeles Mail - Neighborhood Watch Committee Meeting.pdf
- City of Los Angeles Mail - Notification_CD13 Pit Stop Launch Briefing @ Mon Mar 5, 2018 11_30am - 12pm (PST) (juan.fregoso@lacity.org).pdf
- City of Los Angeles Mail - Neighborhood Watch Committee Meeting_October 16, 12pm-1_30pm.pdf
- City of Los Angeles Mail - Notification_Hoover Encampment Fire_Coordination Meeting @ Wed May 1, 2019 2pm - 3_30pm (PDT) (juan.fregoso@lacity.org).pdf
- City of Los Angeles Mail - Notification_Juan Brigid Call @ Tue Oct 2, 2018 12pm - 12_30pm (PDT) (juan.fregoso@lacity.org).pdf
- City of Los Angeles Mail - Notification_Neighborhood Watch Committee Meeting (PATH) @ Wed May 22, 2019 1pm - 2_30pm (PDT) (juan.fregoso@lacity.org).pdf
- City of Los Angeles Mail - Notification_Neighborhood Watch Committee Meeting @ Wed Feb 27, 2019 1pm - 2_30pm (PST) (juan.fregoso@lacity.org).pdf
- City of Los Angeles Mail - Notification_Neighborhood Watch Committee Meeting @ Thu Mar 1, 2018 12pm - 1_30pm (PST) (juan.fregoso@lacity.org).pdf
- City of Los Angeles Mail - Notification_Neighborhood Watch Committee Meeting @ Wed Jun 13, 2018 12pm - 1_30pm (PDT) (juan.fregoso@lacity.org).pdf
- City of Los Angeles Mail - Notification_PATH_CD 13 Check In @ Mon Jul 23, 2018 12pm - 12_30pm (PDT) (juan.fregoso@lacity.org).pdf
- City of Los Angeles Mail - Oakwood Task Force Meeting.pdf
- City of Los Angeles Mail - PATH_CD 13 Check In.pdf
- City of Los Angeles Mail - PATH_CD 13 Meeting.pdf
- City of Los Angeles Mail - Our statewide movement.pdf
- City of Los Angeles Mail - PATH_Juan Call.pdf
- City of Los Angeles Mail - Re_Question - Potential New Bridge to Home Site.pdf
- City of Los Angeles Mail - PMV Phase I Grand Opening.pdf
- City of Los Angeles Mail - Source meeting Edendale Library 8_16 12pm.pdf
- City of Los Angeles Mail - PATH Metro Villas Phase 1 Grand Opening.pdf
- City of Los Angeles Mail - SOURCE PLANNING MEETING 8_16 AT 12PM.pdf
- City of Los Angeles Mail - Results from the Homeless Count.pdf
- City of Los Angeles Mail - The holidays without a home.pdf
- City of Los Angeles Mail - Time to connect soon.pdf
- City of Los Angeles Mail - This is not a home.pdf
- City of Los Angeles Mail - You helped Ron home_.pdf
- City of Los Angeles Mail - You're Invited_Neighborhood Watch Committee Meeting - May 22 @ 1pm.pdf
- City of Los Angeles Mail - What is Giving Tuesday_.pdf

Attachments:

- City of Los Angeles Mail - Hollywood Outreach Collaborative 2-5-18-redacted-1.pdf
- City of Los Angeles Mail - No call this morning-redacted.pdf

--
Bethelwel Wilson
Deputy City Attorney
General Counsel Division
Los Angeles City Attorney's Office
200 N. Main Street, 8th Floor
City Hall East, Mail Stop 140
Los Angeles, CA 90012
bethelwel.wilson@lacity.org



*****Confidentiality Notice *****

This electronic message transmission contains information from the Office of the Los Angeles City Attorney, which may be confidential or protected by the attorney-client privilege and/or the work product doctrine. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the content of this information is prohibited. If you have received this communication in error, please notify us immediately by e-mail and delete the original message and any attachments without reading or saving in any manner.

*****Confidentiality Notice *****

This electronic message transmission contains information from the Office of the Los Angeles City Attorney, which may be confidential or protected by the attorney-client privilege and/or the work product doctrine. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the content of this information is prohibited. If you have received this communication in error, please notify us immediately by e-mail and delete the original message and any attachments without reading or saving in any manner.
